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Eileen Stommes
Deputy Administrator
USDA, AMS, TM, NOP
Room 4007-S, AgStop 0275
P.O. Box 96456
Washington, DC 20090-6456

RE: National Organic Program Proposed Rule
Docket # TMD-94-00-2, RIN: 0581-AA40

Dear Deputy Stommes:

The definition of organic as written in the proposed National Organic Standard is grossly inadequate and I am opposed to it in its present state. The proposed rules take a reductionist approach to organic food production that eliminates key concepts such as the health of the agro-ecosystem and biodiversity of the farm. I do not feel that USDA certified organic food would be healthy for myself, my family, or my environment. I demand that the following revisions be made to the rule prior to implementation:

Subpart B Organic Crop and Livestock Production and Handling Requirements

Organic Crop Production Requirements

Section 205.5 Land Requirements. Current organic standards mandate that the complete history of proposed agricultural land be taken under consideration prior to granting organic certification. This practice should not be changed.

Section 205.7 Soil Fertility and Crop Nutrient Management. So called "biosolids", or toxic sewage sludge "fertilizers" should be explicitly prohibited from being spread on farmlands and pastures where animals graze and food is grown.

Organic Livestock Production Requirements

Section 205.13 Livestock Feed. The feeding back of diseased and waste animal body parts, offal, and blood to farm animals is forced cannibalism and has led to Mad Cow Disease in Europe. This practice should be explicitly prohibited.

Section 205.15 Livestock Conditions and Manure Management. The use of inhumane, intensive-confinement "factory-style farming" practices should be explicitly prohibited.

Organic Handling Requirements

Section 205.16 Product Composition. The use of genetic "engineering" or manipulation, to produce any unnatural plant or animal characteristics should be explicitly prohibited.

Section 205.17 Processing Practices. Using radioactive nuclear waste to kill bacteria and artificially prolong shelf life of food should be explicitly prohibited.

Crop Production Substances

Section 205.22 Active synthetic substances allowed for use in organic crop production. All loopholes created by terms unfamiliar to the organic industry such as "active" and "nonactive" synthetic ingredients, which could allow synthetic materials and ingredients in organic production, should be eliminated.

Livestock Production Substances

Section 205.24 Active synthetic substances allowed for use in organic livestock production. All loopholes created by terms unfamiliar to the organic industry such as "active" and "nonactive" synthetic ingredients, which could allow synthetic materials and ingredients in organic production, should be eliminated.

The authority of the National Organic Standards Board, clearly mandated in the Organic Foods Production Act of 1990, should be honored and their veto power should NOT be weakened.

I object to the weakening of any present organic standards and demand that states and private certifiers have authority to uphold stricter standards than the USDA.

And lastly, the Secretary of Agriculture should NOT have SOLE authority to certify and decertify growers, processors and manufacturers.

Sincerely,